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By Email & Overnight Courier

Barbara Anne Sousa, Esq.
Verizon New England, Inc.
185 Franklin Street, Room 1403
Boston, MA 02110-1585

Re: ***D.T.E. 01-34***

Dear Barbara Anne:

This is in response to your letter of March 7, 2002, and also follows up on our subsequent voicemails and the telephone conversation we had yesterday.

As we understand the request made in your letter, Verizon is undertaking the highly unusual step of asking WorldCom to provide Verizon with information regarding Verizon's provisioning of circuits for one of Verizon's own retail customers – a business transaction to which WorldCom is not a party. Specifically, Verizon seeks additional information regarding two transactions discussed in Attachment C to the Direct Testimony of Karen Furbish. Attachment C, as you know, is the Declaration of Eric Gillenwater on Behalf of WorldCom, Inc. ("Gillenwater Declaration"), which was submitted in the special access proceeding before the New York Public Service Commission (Case 00-C-2051). Mr. Gillenwater explained that his contact at Bloomberg Financial Services ("Bloomberg") informed him that, on two separate occasions, Bloomberg had ordered "back-up" circuits from Verizon that were provisioned more quickly than the Verizon circuits Bloomberg had ordered through WorldCom (*see* Gillenwater Declaration at ¶¶ 9, 13). Notwithstanding the fact that the Gillenwater Declaration already provides the dates on which the Verizon retail circuits were ordered, the identity of the customer placing the order and the identities of the entities to be connected to the customer, Verizon claims it does not have sufficient information to investigate the matter. As such, Verizon is seeking from WorldCom the Verizon order numbers and Verizon circuit IDs associated with the "back up" orders Bloomberg placed with Verizon.

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WorldCom of course would not ordinarily have access to this information and I have confirmed with Mr. Gillenwater that his contact at Bloomberg did not share this information with him when she informed him of Bloomberg's placement of its "back up" orders. Furthermore, WorldCom is under no absolutely obligation to obtain this information on behalf of Verizon. However, in the interest of furthering the Department's investigation, WorldCom has obtained from Bloomberg what we believe to be the Verizon order numbers for the two "back up" circuits. Specifically, WorldCom has been informed that the "back up" order for Order #NYC15838 (*see* Gillenwater Declaration at ¶¶3-9) is Verizon order #C2XT2690, and the "back up" order for Order #NYC 68050 (*see* Gillenwater Declaration at ¶¶10-13) is Verizon order #C2AN9686. Please be advised that WorldCom wishes to be kept informed with respect to the results of Verizon's investigation; our information request will issue under separate cover (as will our supplemental response to VZ-WCOM 1-1).

Finally, as you will recall from our telephone conversation of yesterday, I questioned why Verizon has been pursuing in Massachusetts discovery regarding the Gillenwater Declaration that it chose not to pursue in the New York case where the declaration was originally filed. You responded that Verizon first became aware of the Gillenwater Declaration with its filing as an attachment to Ms. Furbish's testimony in Massachusetts, and that it was your belief (as a result of discussions with Verizon's New York counsel) that Verizon had no notice of its having been filed in the New York proceeding. You asked that I investigate whether the Gillenwater Declaration was, in fact, filed in New York. It was. I am enclosing a copy of an email sent to the service list in Case 00-C-2051 on January 12, 2001. It attaches WorldCom's cover letter and Comments, the Gillenwater Declaration, and a declaration of another WorldCom employee, Tom Smutney. Among the many recipients in the "To" field are "sandra.d.thorn@verizon.com" and "william.r.allan@verizon.com." The cover letter also indicates that this filing was mailed to "all active parties," of which Verizon was one.

Please call me if you have any questions. Thank you.

Very truly yours,

Christopher J. McDonald

Enclosures

cc (by email & overnight courier):	Mary L. Cottrell, Secretary Joan Foster Evans, Esq., Hearing Officer Michael Isenberg, Director – Telecommunications Division
cc (by email & U.S. Mail):	Service List